

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OMAR MALCOLM, KARVEN ALCINDOR,  
ANTHONY APONTE, SHIRLENE BLAIR, DERYCK  
CHARLES, LATIF CORNELIUS, LANAE CURRY,  
JOSE DEJESUS, SHAKIYNA ESPINO, ROBERTO  
FERNANDEZ, VLAJEMY FRANCOIS, CRYSTAL  
GARNETT, CHANTEL GOUVEIA, APRIL HERNEY-  
KOSAKOWSKI, TAMELLE HILLIARD, YOLANDA  
HOLMES, MONIQUE JOHNSON, KEYSHA LEWIS,  
CAROLYN MARAJ, HUZIRAN MOZEB, ZHIHUI PU,  
DAVID RUDDOCK, MYRLINE ULYSSES, and BRICE  
WILLIAMS, individually and on behalf of all others  
similarly situated,

Case No. 20-CV-09641  
(ALC)(SDA)

**Hon. Andrew L. Carter, Jr.**

Plaintiffs,

- against -

THE CITY OF NEW YORK,

Defendant.  
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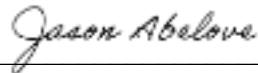
**PLAINTIFFS' UNOPPOSED MOTION FOR APPROVAL OF COLLECTIVE ACTION  
SETTLEMENT AGREEMENT**

Plaintiffs Omar Malcolm, Karven Alcindor, Anthony Aponte, Shirlene Blair, Deryck Charles, Latif Cornelius, Lanae Curry, Jose DeJesus, Shakiyna Espino, Roberto Fernandez, Vlajemy Francois, Crystal Garnett, Chantel Gouveia, April Herney-Kosakowski, Tamelle Hilliard, Yolanda Holmes, Monique Johnson, Keysha Lewis, Carolyn Maraj, Huziran Mozeb, Zhihui Pu, David Ruddock, Myrline Ulysses, and Brice Williams, through counsel, hereby move this Court for approval of the Collective Action Settlement Agreement reached by the Parties in this case. As set out in the supporting Memorandum of Law and Declarations submitted with this Motion, the Settlement Agreement is fair and reasonable, and should be approved by this Court. Accordingly, Plaintiffs respectfully request that the Court issue an Order: 1) certifying the Settlement Collective (consistent with Exhibit A to the Collective Action Settlement Agreement attached as Exhibit 1 to the

Abelove Declaration) for settlement purposes only and deeming all Plaintiffs to be members of the Settlement Collective consistent with their consent to join forms; 2) approving attorneys' costs and expenses and one-third of the Gross Settlement Amount less said costs and expenses as attorneys' fees; 3) approving the proposed notice and authorizing distribution of the notice to the Settlement Collective; 4) appointing Analytics Consulting, LLC as claims administrator and awarding related costs; (5) granting approval of the Collective Action Settlement Agreement and dismissing this case with prejudice in accordance with the terms of the Collective Action Settlement Agreement; and (6) maintaining jurisdiction over the implementation of the terms of the Collective Action Settlement Agreement. Defendant consents to this Motion and all relief requested.

Dated: Garden City, New York  
July 15, 2024

Respectfully submitted,  
Law Offices of Jason L. Abelove



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